

1 JASON M. FRIERSON
 United States Attorney
 2 District of Nevada
 Nevada Bar Number 7709
 3 DAVID KIEBLER
 Assistant United States Attorney
 4 501 Las Vegas Boulevard South
 Suite 1100
 5 Las Vegas, Nevada 89101
 702-388-6519 (phone)
 6 702-388-5087 (fax)
 david.kiebler@usdoj.gov
 7 Attorney for the United States of America

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
AUG 23 2023	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 RICHARD EDWIN SANCHEZ,
 AKA "TRIGGER"

14 Defendant.

CRIMINAL INDICTMENT

Case No. 2:23-cr-0158-GMN-DJA

VIOLATIONS:

21 U.S.C. §§ 841(a)(1) and (b)(1)(b) –
 Distribution of a Controlled Substance

18 U.S.C. §§ 922(a)(1)(A), 923(a), and
 924(a)(1)(D) – Engaging in the Business of
 Dealing and Manufacturing Firearms Without a
 License

18 U.S.C. § 922(o) – Possession or Transfer
 of a Machinegun

20 **THE GRAND JURY CHARGES THAT:**

21 **COUNT ONE**

22 *Distribution of a Controlled Substance*
 (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

23

On or about April 21, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

Engaging in the Business of Dealing or Manufacturing Firearms Without a License
(18 U.S.C. §§ 922(a)(1)(A), 923(a) and 924(a)(1)(D))

Between on or about April 24, 2023, and August 3, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

defendant herein, not being a licensed dealer, importer, or manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT THREE

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about April 24, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about April 26, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about May 1, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about May 5, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about May 18, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

Possession or Transfer of a Machinegun
(18 U.S.C. §§ 922(o) and 924(a)(2))

On or about May 18, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

defendant herein, did knowingly possess or transfer a machinegun, to wit: four selector switches used to modify semi-automatic firearms to fire as fully automatic firearms, enabling the firearm to automatically shoot more than one shot without manual reloading, by a single function of the trigger, all in violation of Title 18, United States Code, Section 922(o) and 924(a)(2).

COUNT NINE

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about May 23, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

1 defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II
2 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
3 841(b)(1)(C).

4 **COUNT TEN**

Possession or Transfer of a Machinegun
5 (18 U.S.C. §§ 922(o) and 924(a)(2))

6 On or about June 6, 2023, in the State and Federal District of Nevada,

7 **RICHARD EDWIN SANCHEZ,**
8 **aka "Trigger,"**

9 defendant herein, did knowingly possess or transfer a machinegun, to wit: seven selector
10 switches used to modify semi-automatic firearms to fire as fully automatic firearms,
11 enabling the firearm to automatically shoot more than one shot without manual reloading,
12 by a single function of the trigger, all in violation of Title 18, United States Code, Section
13 922(o) and 924(a)(2).

14 **COUNT ELEVEN**

Possession or Transfer of a Machinegun
15 (18 U.S.C. §§ 922(o) and 924(a)(2))

16 On or about June 13, 2023, in the State and Federal District of Nevada,

17 **RICHARD EDWIN SANCHEZ,**
18 **aka "Trigger,"**

19 defendant herein, did knowingly possess or transfer a machinegun, to wit: seven selector
20 switches used to modify semi-automatic firearms to fire as fully automatic firearms,
21 enabling the firearm to automatically shoot more than one shot without manual reloading,
22 by a single function of the trigger, all in violation of Title 18, United States Code, Section
23 922(o) and 924(a)(2).
24

COUNT TWELVE

Possession or Transfer of a Machinegun
(18 U.S.C. §§ 922(o) and 924(a)(2))

On or about August 3, 2023, in the State and Federal District of Nevada,

RICHARD EDWIN SANCHEZ,
aka "Trigger,"

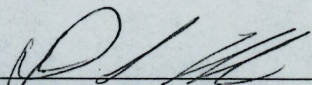
defendant herein, did knowingly possess or transfer a machinegun, to wit: three selector switches used to modify semi-automatic firearms to fire as fully automatic firearms, enabling the firearm to automatically shoot more than one shot without manual reloading, by a single function of the trigger, all in violation of Title 18, United States Code, Section 922(o) and 924(a)(2).

DATED: this 23rd day of August 2023.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON
United States Attorney



DAVID KIEBLER
Assistant United States Attorney